

BLANK ROME LLP  
 Attorneys for Plaintiffs  
 NEW TRAIL CAPITAL  
 and MICHAEL BEER  
 405 Lexington Avenue  
 New York, NY 10174-0208  
 (212) 885-5000  
 David D. Jensen (DJ-2261)

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

NEW TRAIL CAPITAL, a sole proprietorship,  
 and MICHAEL BEER,

Plaintiffs,

-against-

THE NORTHWEST COMPANY, INC.,  
 Defendant.

07 Civ. 9679 (LAK) (RLE)

**MOTION TO ADMIT COUNSEL,  
 REBECCA D. WARD, ESQ.  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, David D. Jensen, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Rebecca D. Ward, Esq.  
 Blank Rome LLP  
 130 North 18<sup>th</sup> Street  
 Philadelphia, PA 19103-6998  
 Phone: (215) 569-5500 / Fax: (215) 569-5500

Rebecca D. Ward is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the State of Illinois. There are no pending disciplinary proceedings against Rebecca D. Ward in any State or Federal Court.

Dated: July 3, 2008  
 New York, New York



David D. Jensen (DJ-2261)  
 Blank Rome LLP  
 405 Lexington Avenue  
 New York, NY 10174  
 (212) 885-5000

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THE NORTHWEST COMPANY, INC.,

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07 Civ. 9679 (LAK) (RLE)

**AFFIDAVIT OF DAVID D.  
JENSEN, ESQ. IN SUPPORT  
OF MOTION TO ADMIT  
REBECCA D. WARD, ESQ.  
*PRO HAC VICE***

State of New York                     )  
  )       ss:  
County of New York                 )

David D. Jensen, being duly sworn, hereby deposes and says as follows:

1. I am associated with the firm Blank Rome LLP, counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' Motion to Admit Rebecca D. Ward as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bars of the States of New York and New Jersey, and I was first admitted to practice law in New Jersey in 2003 and in New York in 2004. I am also admitted to the bar of the United States District Court for the Southern and Eastern Districts of New York, and I am in good standing with those Courts.
3. I have known Ms. Ward since the summer of 2007.

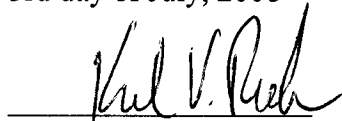
4. Ms. Ward is a partner at Blank Rome LLP in Philadelphia, Pennsylvania. Ms. Ward is admitted to practice in, and is a member in good standing of, the bars of the Commonwealth of Pennsylvania and the State of Illinois. Certificates of good standing obtained from these bars are attached hereto as Exhibit A.
5. I have found Ms. Ward to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Rebecca D. Ward, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Rebecca D. Ward, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Rebecca D. Ward, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.



David D. Jensen (DJ-2261)

Sworn to before me this  
3rd day of July, 2008



Notary Public

**KARL V. REDA**  
Notary Public, State of New York  
No. 30-4783126, Qual. in Nassau Cty.  
Certificate Filed in New York County  
Commission Expires **Nov, 30, 2009**



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION  
of the  
SUPREME COURT OF ILLINOIS

One Prudential Plaza  
130 East Randolph Drive, Suite 1500  
Chicago, IL 60601-6219  
(312) 565-2600 (800) 826-8625  
Fax (312) 565-2320

One North Old Capitol Plaza, Suite 333  
Springfield, IL 62701  
(217) 522-6838 (800) 252-8048  
Fax (217) 522-2417

Rebecca Desiree Ward  
Blank Rome LLP  
One Logan Square  
Philadelphia, PA 19103-6933

Chicago  
Thursday, June 26, 2008

In re: Rebecca Desiree Ward  
Admitted: 11/10/1994  
Attorney No. 6226329

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois; is currently registered on the master roll of attorneys entitled to practice law in this state; and has never been disciplined; and is in good standing.

Very truly yours,  
Jerome Larkin  
Administrator

By: 

Thomas W. Peters  
Registrar

TWP:ao



Supreme Court of Pennsylvania

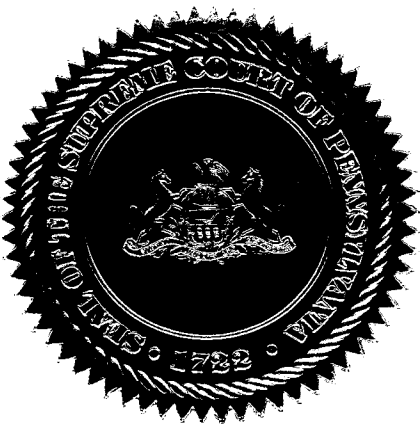
**CERTIFICATE OF GOOD STANDING**

***Rebecca Desiree Ward, Esq.***

**DATE OF ADMISSION**

***May 19, 1997***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: June 4, 2008

A handwritten signature in black ink, appearing to read "Patricia A. Johnson".

Patricia A. Johnson  
Chief Clerk

BLANK ROME LLP  
Attorneys for Plaintiffs  
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David D. Jensen (DJ-2261)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Plaintiffs,

-against-

THE NORTHWEST COMPANY, INC.,  
Defendant.

07 Civ. 9679 (LAK) (RLE)

**PROPOSED  
ORDER FOR ADMISSION  
*PRO HAC VICE*  
ON WRITTEN MOTION**

Upon the motion of David D. Jensen, Esq., attorney for Plaintiffs New Trail Capital and Michael Beer, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Rebecca D. Ward, Esq.  
Blank Rome LLP  
130 North 18<sup>th</sup> Street  
Philadelphia, PA 19103-6998  
Phone: (215) 569-5500 / Fax: (215) 569-5500  
ward@blankrome.com

is admitted to practice pro hac vice as counsel for Plaintiffs New Trail Capital and Michael Beer in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic

Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: July \_\_, 2008  
New York, New York

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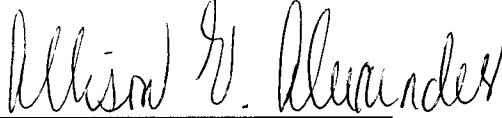
Lewis A. Kaplan  
United States District Judge

**AFFIDAVIT OF SERVICE**

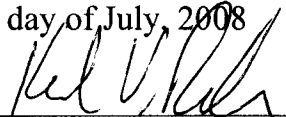
STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF NEW YORK                )

Allison E. Alexander, being duly sworn deposes and says that she is over the age of eighteen (18) years and is not a party to this action; that on the 3rd day of July, 2008, she served the within **MOTION TO ADMIT REBECCA D. WARD, ESQ. *PRO HAC VICE*** and **AFFIDAVIT OF DAVID D. JENSEN, ESQ. IN SUPPORT OF MOTION TO ADMIT REBECCA D. WARD, ESQ. *PRO HAC VICE***, by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to the following persons at the last known address set forth after their names:

Philippe A. Zimmerman, Esq.  
Moses & Singer LLP  
405 Lexington Avenue  
New York, New York 10174

  
Allison E. Alexander

Sworn to before me this  
3rd day of July, 2008

  
\_\_\_\_\_  
Notary Public

KARL V. REDA  
Notary Public, State of New York  
No. 30-4783126, Qual. in Nassau Cty.  
Certificate Filed in New York County  
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